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COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

Senior Care Centers, LLC, *et al.*,¹

Debtors.

§
§ Chapter 11
§
§ Case No. 18-33967 (BJH)
§
§ (Jointly Administered)
§

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON APRIL 12, 2019 AT 9:00 A.M. (CT)**

MATTERS GOING FORWARD

1. Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Unexpired Leases and Executory Contracts and (II) Granting Certain Related Relief [Docket No. 448; Filed: 1/29/2019]

Objection Deadline: February 19, 2019

Related Documents(s):

- a) Omnibus Notice of Hearing [Docket No. 451; Filed: 1/30/2019]
- b) Supplemental Exhibit to the Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Unexpired Leases

¹ The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

and Executory Contracts, and (II) Granting Certain Related Relief [Docket No. 472; Filed: 2/6/2019]

Responses Received:

- a) Limited Objection of GLS Hospice Properties, LLC to Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Unexpired Leases and Executory Contracts, and (II) Granting Certain Related Relief [Docket No. 503; Filed: 2/13/2019]
- b) Response and Limited Objection of 1717 West 6th Street (TX), LLC to Debtors' Third Omnibus Motion (I) Authorizing the Debtors to Reject Certain Unexpired Leases and Executory Contracts, and (II) Granting Certain Related Relief [Docket No. 504; Filed: 2/13/2019]
- c) Response and Objection of Saddleback Sundance, LLC and Saddleback Park Valley, LLC to Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Unexpired Leases and Executory Contracts, and (II) Granting Certain Related Relief [Docket No. 505; Filed: 2/13/2019]
- d) BBA Heath Realty, LLC's Response to Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Unexpired Leases, and (II) Granting Related Relief [Docket No. 532; Filed 2/19/2019]
- e) OLP Wyoming Springs, LLP's Response to Debtors' Third Omnibus Motion to Reject Certain Unexpired Leases and Executory Contracts [Docket No. 533; Filed 2/19/2019]
- f) Round Rock Business Park, L.P., d/b/a ParkWest Corporate Centers's Response to Debtors' Third Omnibus Motion to Reject Certain Unexpired Leases and Executory Contracts [Docket No. 534; Filed 2/19/2019]
- g) Debtors' Omnibus Response to Various Objections to the Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Unexpired Leases and Executory Contracts, and (II) Granting Certain Related Relief [Docket No. 538; Filed 2/20/2019]
- h) Brief In Support of Response to Debtors' Third Omnibus Motion to Reject Certain Unexpired Leases and Executory Contracts [Docket No. 628; Filed 3/04/2019]
- i) Debtors' Memorandum of Law Regarding the Debtors' Obligation to Pay Annual Taxes Pursuant to Bankruptcy Code Section 365(d)(3) [Docket No. 629; Filed 3/04/2019]

Status: This matter will go forward and the Court will issue an oral ruling.

2. Motion of Debtors' to Extend Deadline to Assume or Reject Unexpired Leases and Non-Residential Real Property [Docket No. 592; Filed: 2/28/2019]

Objection Deadline: March 1, 2019

Related Documents(s):

- a) Notice of Hearing [Docket No. 753; Filed: 3/25/2019]
- b) Order Extending the Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property [Docket No. 820; Filed 04/01/2019]

Response(s) Received:

- a) Objection to Debtors' Motion to Extend Deadline to Assume or Reject Unexpired Leases and Nonresidential Real Property [Docket No. 732; Filed 3/20/2019]
- b) Amended Objection to Debtors' Motion to Extend Deadline to Assume or Reject Unexpired Leases and Nonresidential Real Property [Docket No. 733; Filed 3/20/2019]
- c) Lancaster Pollard Mortgage Company LLC's Objection to Motion of Debtors for Entry of an Order Extending the Deadline to Assume or Reject Unexpired Leases and Nonresidential Real Property [Docket No. 736; Filed 3/20/2019]

Status: This matter will go forward with respect to Granite Landlords.

3. Application for Administrative Expenses Claim Filed by Granite Landlords [Docket No. 640; Filed: 3/05/2019]

Objection Deadline: April 3, 2019

Related Documents(s):

- a) Notice of Hearing [Docket No. 753; Filed: 3/25/2019]

Response(s) Received:

- a) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et al. to the Granite Landlords' Applications for Administrative Expense Claim and Motion for the Entry of An Order Granting Adequate Protection [Docket No. 858; Filed 4/03/2019]

Status: This matter will go forward.

4. Motion for Adequate Protection filed by Granite Landlords [Docket No. 641; Filed: 3/07/2019]

Objection Deadline: April 3, 2019

Related Documents(s):

- a) Notice of Hearing [Docket No. 753; Filed: 3/25/2019]

Response(s) Received:

- a) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et al. to the Granite Landlords' Applications for Administrative Expense Claim and Motion for the Entry of An Order Granting Adequate Protection [Docket No. 858; Filed 4/03/2019]

Status: This matter will go forward.

- 5. Motion of G-Debtors for Entry of an Order Approving Compromise and Settlement Pursuant to Bankruptcy Rule 9019 and Granting Related Relief [Docket No. 902; Filed 4/09/2019]

Objection Deadline: April 11, 2019

Related Documents(s):

- a) Motion for Setting and Request for Expedited Hearing [Docket No. 903; filed 4/09/2019]
- b) Supplement to Motion of G-Debtors for Entry of an Order Approving Compromise and Settlement Pursuant to Bankruptcy Rule 9019 and Granting Related Relief [Docket No. 908; Filed 4/10/2019]
- c) Notice of Hearing [Docket No. 909; Filed 4/10/2019]

Response(s) Received:

- a) None

Status: This matter will go forward.

- 6. Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement and (II) Granting Related Relief [Docket No. 836; Filed: 3/07/2019]

Objection Deadline: April 8, 2019

Related Documents(s):

- a) Motion for Expedited Consideration of the Motions of the Debtors for Entry of an Order Approving Settlement Agreement and Transfer of Operations Pursuant to Operations Transfer Agreements [Docket No. 860; Filed: 4/04/2019]

- b) Notice of Hearing [Docket No. 871; Filed 4/05/2019]
- c) Omnibus Certificate of No Objection on Certain Motions [Docket No. 912; Filed 4/10/2019]

Response(s) Received:

- a) None

Status: A certificate of no objection has been filed with the Court attached with redline comparison of the proposed orders and the proposed orders. No hearing is necessary unless the Court directs otherwise.

- 7. Motion of Debtors for Entry of An Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of Certain Facility Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 837; Filed: 3/07/2019]

Objection Deadline: April 8, 2019

Related Documents(s):

- a) Motion for Expedited Consideration of the Motions of the Debtors for Entry of an Order Approving Settlement Agreement and Transfer of Operations Pursuant to Operations Transfer Agreements [Docket No. 860; Filed: 4/04/2019]
- b) Notice of Hearing [Docket No. 871; Filed 4/05/2019]
- c) Certificate of Service [Docket No. 879; Filed 4/08/2019]
- d) Omnibus Certificate of No Objection on Certain Motions [Docket No. 912; Filed 4/10/2019]

Response(s) Received:

- a) Creditor Travis County Objection to Motion Sell Property Free and Clear of Liens under Section 363(f) [Docket No. 891; Filed 4/08/2019]

Status: A certificate of no objection has been filed with the Court attached with redline comparison of the proposed orders and the proposed orders. No hearing is necessary unless the Court directs otherwise.

Dated: April 10, 2019
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

/s/ *Trey A. Monsour*

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